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15 *Attorneys for Defendants*
16 *Wynn Las Vegas, LLC and Wynn Resorts, Ltd.*

17 **UNITED STATES DISTRICT COURT**
18 **DISTRICT OF NEVADA**

19 BRENNNA SCHRADER, an individual, on
20 behalf of herself and all others similarly
21 situated,

22 Plaintiff,

23 vs.

24 STEPHEN ALAN WYNN; an individual;
25 MAURICE WOODEN, an individual, WYNN
26 LAS VEGAS, LLC dba WYNN LAS VEGAS
27 a Nevada Limited Liability, WYNN
28 RESORTS, LTD, a Nevada Limited Liability
Company; and DOES 1-20, inclusive; ROE
CORPORATIONS 1-20, inclusive,

Defendants.

Case No. 2:19-cv-02159-JCM-BNW

STIPULATION TO EXTEND TIME:

- (1) FOR ALL DEFENDANTS TO
RESPOND TO PLAINTIFF'S FIRST
AMENDED COMPLAINT
(Second Request); AND**
- (2) FOR DEFENDANTS TO FILE
MOTION TO CONTINUE STAY OF
DISCOVERY (Second Request)**

22 IT IS HEREBY STIPULATED by and between Plaintiff Brenna Schrader ("Plaintiff"),
23 through her counsel Richard Harris Law Firm, and Defendants Wynn Las Vegas, LLC and Wynn
24 Resorts, Ltd. ("Defendants"), through their counsel Jackson Lewis P.C., Defendant Stephen Alan
25 Wynn, through his counsel Peterson Baker, PLLC, and Defendant Maurice Wooden, by and
26 through his counsel Kennedy & Couvillier, that all Defendants shall have a 14-day extension
27 up to and including **March 31, 2021**, in which to file responses to Plaintiff's First
28 Amended Complaint (ECF No. 90) and to file a Motion to Continue Stay of Discovery.

1 This Stipulation is submitted and based upon the following:

2 1. On May 11, 2020, the Court entered an Order granting Defendants' Motion for
3 Stay of Discovery. ECF No. 57.

4 2. On February 17, 2021, the Court entered an Order that, among other things,
5 granted, in part, Plaintiff's Motion for Leave to File her First Amended Complaint with respect to
6 certain claims. ECF No. 89. Pursuant to the Court's Order, the Clerk's Office filed Plaintiff's First
7 Amended Complaint (ECF No. 90) on February 17, 2021. ECF No. 90.

8 3. The May 11, 2020 Order effectively provided that the parties are to file a joint
9 proposed discovery plan and scheduling order within 14 days after the Court's order resolving
10 Defendants' then-pending motions to dismiss, which was March 3, 2021.

11 4. On March 2, 2021, the Parties stipulated to extend the time for Defendants to
12 respond to the First Amended Complaint from March 3, 2021 to March 17, 2021. ECF No. 91.
13 The Parties also agreed to effectively suspend the deadline to file the proposed discovery plan and
14 scheduling order, and to extend the time for Defendants' to file motions to continue the stay of
15 discovery. *Id.*

16 5. The Court entered an order approving the Stipulation on March 9, 2021. ECF No.
17 92.

18 6. Subsequently, Defendants have determined they need additional time to analyze
19 the allegations and class claims set forth in the First Amended Complaint, including multiple
20 subclasses and exhibits, confer with their respective clients, and prepare their responses to the
21 voluminous First Amended Complaint. Additionally, recent tragic events at Defendant WLV's
22 property involving the death of two employees has required Defendants WLV and WRL to devote
23 their attention to handling those matters, and counsel expects WLV's and WRL's respective
24 representatives will be effectively unavailable for at least several days.

25 7. Based on the foregoing, the Parties have stipulated to extend the time for
26 Defendants to submit their respective responses to the First Amended Complaint and to file
27 Motions to Continue the Discovery Stay to March 31, 2021.

1 8. This is the second request for an extension of time for Defendants to file their
2 respective responses to Plaintiff's First Amended Complaint.

3 9. This is the second request for an extension of time for Defendants to file their
4 Motions to Continue the Discovery Stay.

5 10. This request is made in good faith and not for the purpose of delay.

6 11. Nothing in this Stipulation, nor the fact of entering to the same, shall be construed
7 as waiving any claim and/or defense held by any party.

8 Dated this 11th day of March, 2021.

9 RICHARD HARRIS LAW FIRM

JACKSON LEWIS P.C.

10 /s/ Burke Huber

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17 *Brenna Schrader*

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18 *Ltd.*

19 /s/ Maximiliano Couvillier

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24 *Maurice Wooden*

/s/ Tamara Beatty Peterson

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25 *Attorney for Defendant*
26 *Stephen Alan Wynn*

23 **ORDER**

24 **IT IS SO ORDERED**

25 **DATED:** 3:35 pm, March 15, 2021

26 

27 **BRENDA WEKSLER**
28 **UNITED STATES MAGISTRATE JUDGE**